

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Defendant shall file a letter responding to this letter-motion by **March 27, 2025**. SO ORDERED.

Dated: March 20, 2025

New York, NY SO ORDERED


ROBYN F. TARNOFSKY

UNITED STATES MAGISTRATE JUDGE

VIRAL BHAGAT,

Plaintiff,

— against —

ANUJA SHARAD SHAH A/K/A ANU
SHAH,

Defendant

Case No.: 1:24-cv-01424-VEC

PLAINTIFF'S MOTION TO DEEM
FACTS ADMITTED AND
GENUINENESS OF DOCUMENTS

Plaintiff, Viral Bhagat, respectfully moves the Court to deem facts admitted and documents as genuine under Federal Rule of Civil Procedure 36(a)(3) due to Defendant Anuja Sharad Shah a/k/a Anu Shah's failure to properly respond to Plaintiff's First Set of Requests for Admission ("RFA") and Requests for Production ("RFP").

ARGUMENT

1. Plaintiff served Defendant with the First Set of Requests for Admission ("RFA") and Requests for Production ("RFP") in June 2024. Defendant failed

to timely respond or provided evasive and improper denials to the RFAs and failed to produce documents responsive to the RFPs.


2. Under Rule 36(a)(3), a failure to properly respond results in automatic admission of the facts.
3. Plaintiff's LinkedIn messages with Defendant, referenced as RFA Exhibit B and Motion Exhibit B, are true and accurate copies, as confirmed by Plaintiff's affidavit.
4. The Court should deem the facts in Plaintiff's First Set of RFA Request No. 2 (under RESPONSES TO REQUESTS AS TO DOCUMENTS) admitted and the Document as genuine and complete.

CONCLUSION

Plaintiff respectfully requests that the Court enter an order deeming the LinkedIn messages in Exhibit B as a true and accurate representation of communications between Plaintiff and Defendant.

Dated: San Francisco Bay Area, CA
March 17, 2025

VIRAL BHAGAT

DocuSigned by:

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Pro Se